United States Environmental Protection Agency
Region IV
POLLUTION REPORT

Date: Thursday, November 19, 2009
From: Jason Booth

Subject: Removal Site Evaluation
VCC Albany
717 Flint Avenue, Albany, GA
Latitude: 31.5808000
Longitude: -84.1667000

POLREP No.:	1	**Site #:**	A4LN
Reporting Period:	07/20/2009-11/19/2009	**D.O. #:**	
Start Date:		**Response Authority:**	CERCLA
Mob Date:	7/20/2009	**Response Type:**	Time-Critical
Demob Date:		**NPL Status:**	Non NPL
Completion Date:		**Incident Category:**	Removal Assessment
CERCLIS ID #:	GAD9812377043	**Contract #**	
RCRIS ID #:			

Site Description

The Site is predominantly undeveloped land with the only buildings on site remaining from a defunct drum recycling company, Container Waste Services (CWS). These buildings consist of a rundown workshop/office building and a small cinder block work shed. Several left over drums, totes, debris, and smaller containers are stockpiled on the northeast portion of the Site. Most of the drums appear to be empty; however, a further assessment of the containers will need to be made during any removal action. The Site is bordered to the north by an active railway that at one time serviced the VCC facility. Also to the north is W Roosevelt Avenue and additional businesses. To the east are a vacant lot and an engine repair shop. To the south is Flint Avenue, a small retention pond, the Albany Transit facility and several residences. Finally, to the west are two automotive repair shops and a soft drink distribution facility.

Based on earlier sampling events and the evidence of slag material left over from the superphosphate manufacturing process, Emergency Response and Removal Branch (ERRB) received the Site from the Region 4 Site Assessment Branch for consideration as a possible time-critical removal action. Below are the previous sampling events:

- Exxon-Mobile (sampling conducted by contractor BBL) in January 2006.

- EPA Region 4 RCRA Enforcement and Compliance Branch mobilized to the site in April 2006. Sampling was conducted to determine if contamination present in surface soils were the result of drums from the CWS facility. Six samples were taken from the drums and the sampling conducted showed that none of the samples collected contained a RCRA hazardous waste.

- EPA conducted a Removal Site Evaluation in June 2008 of the entire former VCC facility site. Many areas of the site were inaccessible for sampling due to the numerous drums and debris scattered about the Site. Field screening of the site was conducted using a portable XRF. In-situ soil samples for lead ranged from 21.61 ppm to 22,396 ppm with the latter located near the southeastern corner of the current CWS office structure. In-situ arsenic concentrations ranged from non-detect to just over 3,200 ppm, with the latter located in the same area as the highest lead reading.

Residential and industrial properties around the Site were sampled to determine if VCC's operations had impacted them. All locations screened were below federal screening levels for lead and arsenic.

Analytical data from the sampling event confirmed exceedances of RALs for lead and arsenic On-Site. Lead ranged from 21.9 to 11,200 ppm and arsenic from 1.5 to 652 ppm.

Current Activities

During the week of July 20, 2009, the United States Environmental Protection Agency (EPA) Region 4 On-Scene Coordinator (OSC) and Superfund Technical Assessment and Response Team (START) began a Removal Site Evaluation (RSE) of the Container Waste Services portion of former VCC Albany site. All activities were pursuant to Section 300.410 of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP). Based on a previous RSE, analytical data showed lead and arsenic concentrations above EPA's commercial Removal Action Levels (RALs) on the property. The purpose of this second phase of the RSE was to delineate the contamination where drums and other debris in the past had prevented sampling. The Site was divided into 50 by 50 foot grids covering the 4.06-acre parcel. The RSE consisted of a field screening investigation in which 73 five-point composite soil samples were screened for lead and arsenic via XRF. In order to confirm XRF screening results, samples showing XRF results above the RAL for lead (2,000 mg/kg) and/or arsenic (160 mg/kg) were submitted to a laboratory for confirmation purposes.

Lead concentrations obtained via XRF ranged from 41.36 ppm to 6,497.48 ppm. Six surface soil samples collected along the eastern edge of the Site had lead levels above the commercial RAL for lead. Confirmation laboratory results for these six samples ranged from 2,300 mg/kg to 9,900 mg/kg.

Arsenic concentrations obtained via XRF ranged from non-detect to 885.68 ppm. Three surface soil samples collected along the eastern edge of the Site had arsenic levels above the commercial RAL for arsenic. Confirmation laboratory analytical results for these three samples ranged from 190 mg/kg to 650 mg/kg.

Key Issues

Conditions at the Site meet the criteria in Section 300.415 (b)(2) of the NCP for implementation of a removal action.

Section 300.415(b)(2)(i): "Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants."

Investigation of the Site has documented that lead and arsenic concentrations in surface soil exceed RALs for commercial/industrial land-use settings. Approximate values for lead and arsenic were

XRF-screened as high as 6,500 mg/kg and 880 mg/kg, respectively. Elevated concentrations were confirmed via laboratory derived data from the most recent investigation.

The contaminated soil remains within a poorly maintained fenced area with at least one observed breach that could be potentially accessed by trespassers who may become exposed to the soil. Anyone entering the Site may potentially be exposed to lead and arsenic through direct contact, inhalation, and/or digestion. Off-site migration of lead and arsenic via erosion or airborne dust may lead to the exposure of nearby residents to these hazardous substances.

Section 300.415(b)(2)(iv): "High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface, that may migrate."

Lead concentrations in surface soils within the Site were XRF-screened at concentrations up to 6,500 mg/kg. Most of the contaminated soils were found along the Site boundaries where there is little to no vegetation. These factors increase the likelihood of off-site migration.

Section 300.415(b)(2)(v): "Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released."

As stated above, contamination of soils along the Site boundaries increases the possibility of contaminated soils being transported off-site via runoff. Due to the property's natural southward slope, heavy rainfall could potentially carry contaminated soils towards Flint Avenue where it could enter storm sewers and possibly the retention pond across Flint Avenue.

Section 300.415 (b)(2)(vii): "The availability of other appropriate federal or state response mechanisms to respond to the release."

EPA has contacted the Georgia Environmental Protection Department (GAEPD) to inquire about a possible State cleanup. GAEPD lacks available funds to implement cleanup at the Site. There are no other appropriate federal or state response mechanisms to take responsibility for this removal action in a time-critical manner.

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